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August 29, 2024

**VIA ECF**

Honorable Cheryl L. Pollak, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Williams v. The Russo's Payroll Group, Inc., *et al.***  
**Case No.: 1:21-cv-2922 (EK) (CLP)**  
**MLLG File No.: 75-2021**

Dear Judge Pollak:

We represent Defendants The Russo Payroll Group, Inc., Robert Russo,<sup>1</sup> and Giuseppe Joe Vacca (collectively the "Defendants") in the above-referenced matter. In accordance with the Court's August 9, 2024 Order (ECF No. 69), Defendants, together with Plaintiff Kalief Williams, write to provide the Court with the following agreed-upon schedule for the remaining depositions in this matter:

| Deponent         | Date      | Time     | Location                 |
|------------------|-----------|----------|--------------------------|
| Frank Russo, Jr. | 9/10/2024 | 10:00 AM | Virtual                  |
| Philip Montante  | 9/23/2024 | 10:00 AM | Virtual                  |
| Kalief Williams  | 9/11/2024 | 10:00 AM | Offices of Milman Labuda |
| Joanne Russo     | 9/16/2024 | 10:00 AM | Virtual                  |
| Danielle Silva   | 9/23/2024 | 10:00 AM | Offices of Milman Labuda |

Thank you for your attention to this matter.

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<sup>1</sup> As the Court is aware, Robert Russo passed away on April 16, 2024. (*See* ECF No. 67). On August 8, 2024, this Court recommended that the district court dismiss Plaintiff's claims against Robbie Russo. (*See* ECF. No. 68; Report and Recommendation, dated August 8, 2024).

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Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Colleen O'Neil

cc: All counsel of record via ECF.